

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

SCOTT VINCENT,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION No: 1:08CV067
)	
)	
GERALD JONES VOLKSWAGEN, INC.)	
d/b/a GERALD JONES HONDA,)	
AMERICAN HONDA MOTOR CO.,)	
AND TAKATA CORPORATION,)	
)	
DEFENDANTS.)	

MOTION TO FILE UNDER SEAL

SCOTT VINCENT, Plaintiff herein, moves the Court to enter an order pursuant to Local Rule 79.7 directing the Clerk to file under seal the depositions of James H. Raddin, Jr., M.D., S.M., Geoffrey Germaine, Ph.D., and Theodore Klaus and the exhibits contained therein. These depositions and exhibits contain, or may contain, confidential protected information subject to a Protective Order the parties previously agreed to and which was entered by the Court (doc. no. 126). To ensure compliance with the June 19, 2009 Protective Order (doc. no. 126), Plaintiff requests that these materials be filed under seal restricted to parties of this lawsuit only and not be in the public record.

A proposed Order is submitted herewith.

Respectfully submitted, this 13th day of August, 2009.

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2009 a copy of the foregoing Motion to File Under Seal was filed with the Clerk of Court using the CM/ECT system, which will automatically send email notification of such file to the following attorneys of record:

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This 13th day of August, 2009

s/ James E. Carter
James E. Carter
Attorney for Plaintiff